

ORAU TEAM Dose Reconstruction Project for NIOSH

Oak Ridge Associated Universities I Dade Moeller & Associates I MJW Corporation

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Document Title: Pantex Plant – Occup	pational Environmental Dose	Document Number: Revision: Effective Date:	ORAUT- 01 06/22/20	TKBS-0013-4 07
		Type of Document: Supersedes:	TBD Revision	00
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☐ New		Revision	Page C	hange

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PUBLICATION RECORD

EFFECTIVE	REVISION	
DATE	NUMBER	DESCRIPTION
08/24/2004	00	New technical basis document for the Pantex Plant – Occupational
		Environmental Dose. Incorporates internal review and NIOSH
		comments. Incorporates additional internal review and NIOSH
		comments. First approved issue. Initiated by Dillard B. Shipler.
06/22/2007	01	Revised to include Attributions and Annotations. Constitutes a total
		rewrite of the document. Incorporates formal internal review
		comments. No changes were needed as a result of formal NIOSH
		review. This revision results in no change to the assigned dose and
		no PER is required. Initiated by John J. Fix.

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ACRONYMS AND ABBREVIATIONS

AMAD activity median aerodynamic diameter Annual Site Environmental Report ASER

Βq **Becquerel**

Ci curie

CDC Centers for Disease Control and Prevention

CEDE committed effective dose equivalent

CY calendar year

DOE U.S. Department of Energy

DU depleted uranium

EEOICPA Energy Employees Occupational Illness Compensation Program Act of 2000

EΗ environment, safety, and health (DOE)

effective dose equivalent EDE

EPA U.S. Environmental Protection Agency

FD fenceline dosimeter

FL fenceline FS firing site

gram

g GM Geiger-Mueller

h hour 3 H tritium

ΗE high explosive

ICRP International Commission on Radiological Protection Integrated Modules for Bioassay Analysis (program) **IMBA**

m meter millirem mrem mL milliliter

mph miles per hour

NCRP National Council on Radiation Protection and Measurements

NIOSH National Institute for Occupational Safety and Health

OCAS Office of Compensation and Support

onsite dosimeter OD

OS off-site

PD onsite dosimeter

POC probability of causation

RBM red blood marrow unit of radiation dose rem

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Sv sievert

TBD to be determined TBq TLD terabecquerel

thermoluminescent dosimeter

U.S.C. **United States Code**

yr year

micro, 10⁻⁶ μ

§ section or sections

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1 4.1 INTRODUCTION

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2 Technical basis documents and site profile documents are not official determinations made by the

National Institute for Occupational Safety and Health (NIOSH) but are rather general working

4 documents that provide historic background information and guidance to assist in the preparation of

dose reconstructions at particular sites or categories of sites. They will be revised in the event

6 additional relevant information is obtained about the affected site(s). These documents may be used

7 to assist NIOSH staff in the completion of the individual work required for each dose reconstruction.

8 In this document the word "facility" is used as a general term for an area, building, or group of

buildings that served a specific purpose at a site. It does not necessarily connote an "atomic weapons

- 10 employer facility" or a "Department of Energy [DOE] facility" as defined in the Energy Employees
- Occupational Illness Compensation Program Act [EEOICPA; 42 U.S.C. § 7384I(5) and (12)].
- 12 EEOICPA defines a DOE facility as "any building, structure, or premise, including the grounds upon
- which such building, structure, or premise is located ... in which operations are, or have been,
- 14 conducted by, or on behalf of, the Department of Energy (except for buildings, structures, premises,
- grounds, or operations ... pertaining to the Naval Nuclear Propulsion Program)" [42 U.S.C. §
- 16 7384I(12)]. Accordingly, except for the exclusion for the Naval Nuclear Propulsion Program noted
- 17 above, any facility that performs or performed DOE operations of any nature whatsoever is a DOE
- 18 facility encompassed by EEOICPA.
- 19 For employees of DOE or its contractors with cancer, the DOE facility definition only determines
- 20 eligibility for a dose reconstruction, which is a prerequisite to a compensation decision (except for
- 21 members of the Special Exposure Cohort). The compensation decision for cancer claimants is based
- 22 on a section of the statute entitled "Exposure in the Performance of Duty." That provision [42 U.S.C. §
- 23 7384n(b)] says that an individual with cancer "shall be determined to have sustained that cancer in the
- 24 performance of duty for purposes of the compensation program if, and only if, the cancer ... was at
- least as likely as not related to employment at the facility [where the employee worked], as
- determined in accordance with the POC [probability of causation¹] guidelines established under
- 27 subsection (c) ..." [42 U.S.C. § 7384n(b)]. Neither the statute nor the probability of causation
- 28 guidelines (nor the dose reconstruction regulation) define "performance of duty" for DOE employees
- with a covered cancer or restrict the "duty" to nuclear weapons work.
- 30 As noted above, the statute includes a definition of a DOE facility that excludes "buildings, structures,
- 31 premises, grounds, or operations covered by Executive Order No. 12344, dated February 1, 1982
- 32 (42 U.S.C. 7158 note), pertaining to the Naval Nuclear Propulsion Program" [42 U.S.C. § 7384l(12)].
- 33 While this definition contains an exclusion with respect to the Naval Nuclear Propulsion Program, the
- 34 section of EEOICPA that deals with the compensation decision for covered employees with cancer
- 35 [i.e., 42 U.S.C. § 7384n(b), entitled "Exposure in the Performance of Duty"] does not contain such an
- 36 exclusion. Therefore, the statute requires NIOSH to include all occupationally derived radiation
- 37 exposures at covered facilities in its dose reconstructions for employees at DOE facilities, including
- 38 radiation exposures related to the Naval Nuclear Propulsion Program. As a result, all internal and
- 39 external dosimetry monitoring results are considered valid for use in dose reconstruction. No efforts
- 40 are made to determine the eligibility of any fraction of total measured exposure for inclusion in dose
- 41 reconstruction. NIOSH, however, does not consider the following exposures to be occupationally
- 42 derived:

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- Radiation from naturally occurring radon present in conventional structures
- Radiation from diagnostic X-rays received in the treatment of work-related injuries

¹ The U.S. Department of Labor is ultimately responsible under the EEOICPA for determining the POC.

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1 **4.1.1** Purpose

- 2 The purpose of this TBD is to describe the Pantex Plant occupational environmental doses. The Oak
- 3 Ridge Associated Universities (ORAU) Team will use this information as needed to evaluate
- 4 environmental doses for EEOICPA claims.

4.1.2 <u>Scope</u>

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- 6 Pantex operations have played an important role in the U.S. nuclear weapons program. Historically,
- 7 Pantex provided several roles associated with the assembly, disassembly, retrofit, and modification of
- 8 nuclear weapon systems (Mitchell 2003). Today, Pantex continues to fabricate high explosives and to
- 9 assemble nuclear weapons. The principal operations at this site, however, are the dismantling of
- 10 retired nuclear weapons and the maintenance of the nation's nuclear weapons stockpile. Pantex,
- which is operated by DOE's Office of Defense Programs, is the only facility in the United States that
- 12 performs these operations.
- 13 The occupational environmental dose is the dose received by workers on the site but outside facilities.
- 14 This dose can be internal and external depending on the characteristics of the individual
- radionuclides. Radionuclides present at the Pantex Plant include tritium, uranium, plutonium, and
- 16 thorium. Pantex neither uses or releases noble gases (BWXT Pantex 2001). While most inhaled
- 17 radionuclides would give a dose to particular organs in the body, tritium gas would give a dose to the
- whole body. The following sections discuss radionuclides present at Pantex.
- 19 Attributions and annotations, indicated by bracketed callouts and used to identify the source,
- justification, or clarification of the associated information, are presented in Section 4.5.

4.2 INTERNAL DOSE FROM ONSITE ATMOSPHERIC RADIONUCLIDE CONCENTRATIONS

- 23 The internal dose to workers outside facilities is determined from air concentrations that resulted from
- 24 individual facility releases, ground-level releases (e.g., burning activities), and the resuspension of
- 25 radioactive materials in soil. Unmonitored workers could have received internal or external
- occupational doses (or both) from any or all of these sources. Figure 4-1 shows the major areas of
- 27 the Pantex Plant site.
- 28 To determine the offsite effective dose equivalent from airborne releases, Pantex used the U.S.
- 29 Environmental Protection Agency (EPA)-approved CAP88-PC computer model to evaluate the
- 30 radiological dose that a member of the public could receive during the year (BWXT Pantex 2001,
- 31 pp. 4-5). Figure 4-2 shows the percent contributions to dose that resulted (BWXT Pantex 2001). The
- 32 results indicate the importance to dose of the various radionuclides involved in Pantex operations.
- 33 The analysis encompassed all potential environmental pathways for radioactive material released to
- the air. The source terms for releases to air result from process knowledge, the number of operations
- during the year, and other modifying factors. The source terms represent the maximum possible
- 36 release from a point (stack or vent), an area, or both. Actual releases to the air were much less than
- 37 the maximum estimates, which are essentially the minimum limits of monitoring or detection
- 38 equipment. The total estimated releases and monitoring data from the site were available, but not
- 39 specific source terms [1].

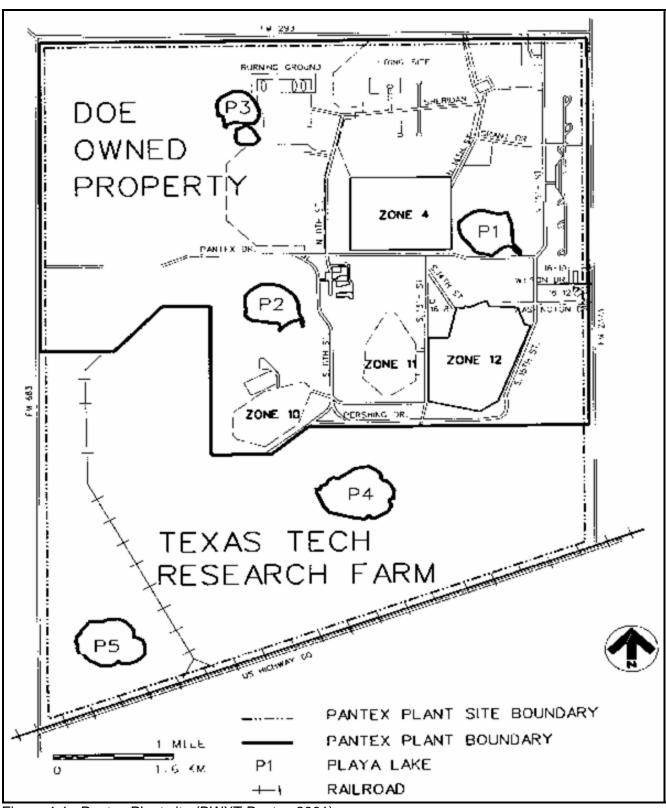


Figure 4-1. Pantex Plant site (BWXT Pantex 2001).

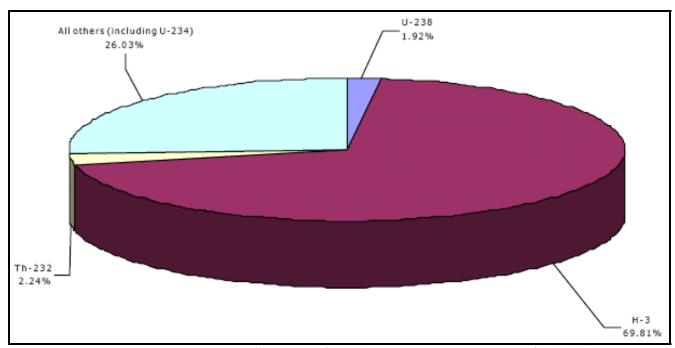


Figure 4-2. Isotopic contributions to offsite dose from Pantex operations in 2000 (BWXT Pantex 2001).

4.2.1 Onsite Releases to Air

Information on releases of radionuclides from Pantex facilities during the Plant's operating period from 1952 through 2000 was obtained from several sources, including Environmental Monitoring Reports (EMRs), Annual Site Environmental Reports (ASERs)(Alexander 1974, 1975, 1976, 1977; Alexander, Cornelius, and Horton 1978; Alexander and Cornelius 1979, 1980; Alexander and Laseter 1981; Laseter 1982, 1983, 1984, 1985, 1986, 1987; Laseter and Langston 1988, 1989; MHSMC 1990, 1991; BP and MHMSC 1992, 1993, 1994, 1995; DOE 1996, 1997; BP and MHC 1998; DOE 1999, 2000; BWXT Pantex 2001, 2002, 2003), annual summaries of radiological doses and releases reported to DOE (DOE 1982, 1984, 1992, 1994; BMI 1985, 1988, 1990a,b; PNL 1993; PNNL 1997a,b), radiation safety department incident records (MHSMC 1986), and radiation safety department technical basis manuals (Pantex 2002). Table 4-1 summarizes releases to the atmosphere from plant vents. EMRs and ASERs contain air release and soil monitoring data, and thermoluminescent dosimeter (TLD) monitoring data from on and off the site. Figure 4-3 shows air sampler locations.

A review of the references determined that the monitoring data are representative for assessing dose. The analysis considered the release and monitoring data, coupled with understanding of historical meteorology (Snyder 1993), to be adequate estimates of radionuclide-specific airborne concentrations for ³H, ²³⁸Pu, ^{239/240}Pu, ^{233/234}U, and ²³⁸U. The uranium used in weapons at Pantex is depleted uranium (DU) that consists primarily of ²³⁸U and small amounts of ²³⁴U, ²³⁵U, and ²³⁶U, all of which are alpha particle emitters with long half-lives (BP 1992, Chapter 5). The ²³⁵U is about 1% of the total activity in DU [2]. Because ²³³U and ²³⁴U cannot readily be chemically separated, they are measured and reported together. In reality, there is no ²³³U on the Pantex Plant [3]. Though small quantities of ²³²Th were released from Pantex facilities, "monitoring of ²³²Th was not consistent because the releases were small and contributed little to dose, as well as that ²³²Th is a naturally occurring form of the element" (BWXT Pantex 2001). Total employment on the site is shown in Figure 4-4. Many employees in early years were not badged indicating the need for assessing missed or unmonitored dose (Prather 2003).

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Table 4-1. Annual releases (curies) to atmosphere.

V	T.:!4!	Total	Total	All adlasses	D - f
Year	Tritium	uranium	plutonium ^a	All others	Reference
1981	9.5E-02	1.0E-05			DOE 1982
1983	5.0E-02	1.0E-05			DOE 1984
1984	1.2E-04				BMI 1989
1985					
1986	1.3E-01	1.0E-05			BMI 1988
1987	9.6E-02				BMI 1990b
1988	1.2E-01				BMI 1990a
1989	4.0E+04	2.1E-05			PNL 1993
1990	2.55E+03				MHSMC 1991
1991	1.7E-01				DOE 1992
1992	1.3E-01			3.5E-07	DOE 1994
1993	3.0E-01				BP and
					MHSMC 1994
1994	4.46E-01				BP and
					MHSMC 1995
1995	1.0E-01				DOE 1996
1996	1.3E-01	1.46E-04		1.67E-17 ²³² Th	DOE 1997
1997	1.17E-01	1.32E-04		1.27E-09 ²³² Th	BP and MHC
					1998
1998	5.34E-02	1.78E-04		1.59E-08 ²³² Th	DOE 1999
1999	1.58E+00	6.97E-05		7.14E-07 ²³² Th	DOE 2000
2000	2.71E+00	6.73E-07		2.76E-07 ²³² Th,	BWXT 2001
				3.28E-06 All other	
				radionuclides	

a. = no releases.

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It was assumed that monitoring data, particularly air monitoring data would be appropriate for dose reconstruction and account for resuspension of radionuclides in soil, particularly, monitoring data would account for the accumulation of long-lived radionuclides in soil during the life of the Plant. In addition, the occurrence of radioactive materials on site was time-related, as follows:

- From 1958 to 1979, the primary operation at Pantex was weapons assembly (Mitchell 2003). Some component testing was performed. A small number of weapons were disassembled for testing and quality control.
- 10 Radioactive materials began arriving at Pantex 1951 (Martin 2004).
- 11 In 1951, DU began arriving as new, bare metal forms (Martin 2004).
 - In 1956, tritium began arriving in sealed containers (Martin 2004).
 - In 1958, plutonium began arriving in sealed metal forms (Martin 2004).
- 14 Thorium began arriving at the plant as new, bare metal forms in the 1960s (Martin 2004).
- From 1952-1958, the only operation at Pantex was weapons assembly (Martin 2004).
 - No tritium containers were manipulated, so no tritium was released [4].
- 17 No metal oxides formed or burned, so no metal oxides were released [5].
- No testing involving radioactive material was performed [6].

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- 1 Small amounts of tritium were released when weapons were disassembled [7].
- 2 There are no specific data to substantiate specific releases of tritium prior to 1972 [8].

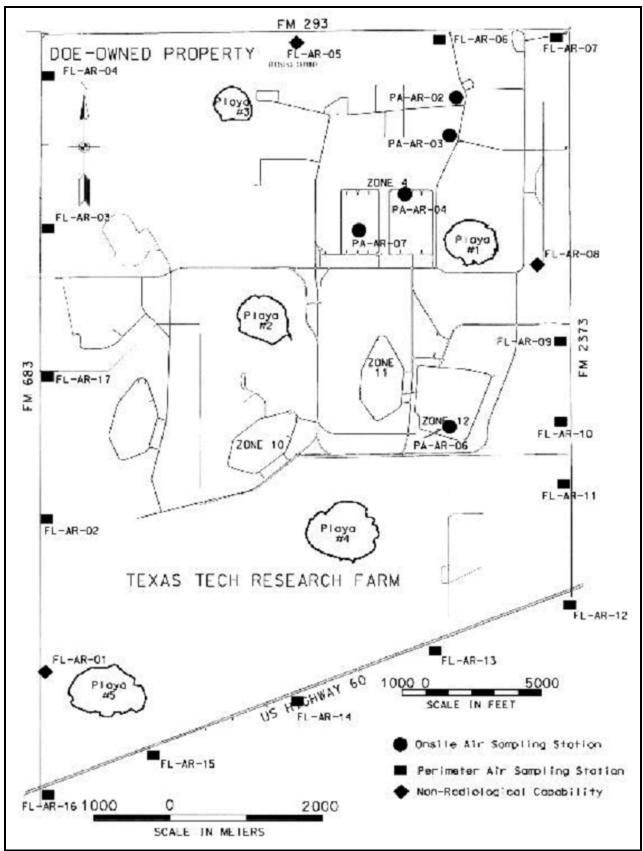


Figure 4-3. Air monitoring stations in 2000 (BWXT Pantex 2001).

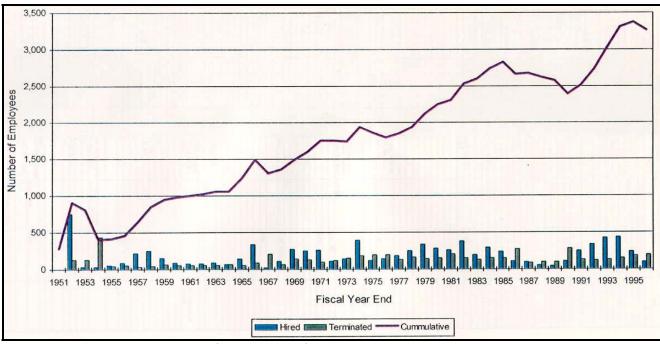


Figure 4-4. Employment history (Mitchell 2003).

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- Some DU was released at the burning grounds with the burning of high-explosive (HE) components (ORAUT 2006a).
- Some DU was released at the firing sites when HE firings involved DU components (ORAUT 2006a).
- Starting in 1958, all assembly and disassembly operations were on complete sealed-pit weapons (Mitchell 2003).
- From 1980 to 1990, disassembly of weapons was performed more often than assembly (DOE 2001a).
- From 1990 to the present, the primary operation at the plant has been large-scale disassembly of weapons (DOE 2001a).
- Though ²³⁸Pu has been part of the monitoring program in recent years, the monitoring was to establish background concentrations in anticipation of a program that would have involved ²³⁸Pu. However, that program never started and ²³⁸Pu was never on the Pantex Plant (Griffis 2004).

It is evident from this information that operations that could lead to releases of radioactive materials were limited until about 1980 [9]. Table 4-1 lists site release data from 1981. Although operations have increased with time and employment, releases from operations have been relatively stable and remain small. As a result, atmospheric dispersion modeling was deemed unnecessary [10]. This selection was based on the maturity of the monitoring program, the technical level of analytical techniques, and the application of quality programs [11]. In other words, these are the best available data.

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- 1 Considering time-related production, time-related availability of radioactive materials on the site, and
- 2 the small concentrations of radioactive materials in the air and soil when releases of radioactive
- 3 materials could have occurred after 1980, initial analyses of potential intakes and resulting doses led
- 4 the authors to believe that potential doses from intakes would be negligible [12]. Additional guidance
- 5 for evaluation of potential intake based on the type of worker and location is provided in the
- 6 Occupational Internal Dose section of the Pantex site profile (ORAUT 2007).

7 **4.2.1.1** Tritium

- 8 Tritium is one of the principal nuclear materials used at the Pantex Plant. It is the heaviest and only
- 9 radioactive isotope of hydrogen, with a physical half-life of 12.35 years. Nuclear operations involving
- 10 tritium have occurred at Pantex since 1956.
- 11 Tritium comes to Pantex in sealed containers that are placed into nuclear assemblies without being
- opened. Therefore, no tritium releases occur during normal assembly operations. Small amounts of
- tritium (a few microcuries per unit) are routinely released during disassembly operations [13].
- 14 A major unplanned accident that resulted in a tritium release occurred at Pantex on May 17, 1989,
- when a conservatively estimated 40,000 Ci were released in a Gravel Gertie cell (ORAUT 2007). It
- 16 was assumed that all the tritium leaked from the cell and the building within 12 days; doses were
- 17 estimated for that period. The estimated potential individual whole body-dose was 1.43 mrem at the
- 18 closest downwind fenceline (MHSMC 1990). The estimated maximum individual onsite dose in the
- downwind direction, NNE, was about 10 times the fenceline dose (MHSMC 1990). Therefore, use a
- 20 15-mrem dose to the whole body for a worker in the area during that period [14].
- 21 At the beginning of 1990, an estimated 2,550 Ci of tritium residual remained trapped in the walls and
- gravel overburden of the cell in which the 1989 release occurred (MHSMC 1991). The analysis
- conservatively assumed that this entire amount was released to the atmosphere during 1990. The
- 24 estimated maximum individual onsite dose in the downwind direction (NNE) was 1.0 mrem. Use this
- value for a worker in the area during that period [15].

26 **4.2.1.2** Uranium

- 27 Uranium arrives at Pantex as a metal (DU, primarily ²³⁸U), uncoated and unsealed (Martin 2004).
- Uranium oxidizes fairly readily in air. When aged weapons are dismantled for inspection,
- 29 refurbishment, or disassembly, significant amounts of uranium-oxide powder can be associated with
- 30 the parts with which it has come in contact [16]. One of type of part is HE that generally is destroyed
- 31 by burning. During the burning, associated powdered uranium is released to the atmosphere
- 32 (ORAUT 2007).
- 33 The alpha-emitting radionuclides of this uranium represent a potential radiological risk if inhaled.
- 34 Isotopes measured to be present include ^{233/234}U and ²³⁸U. For dose reconstruction, assume that ²³⁴U,
- 35 the isotope that results in the maximum organ dose, is present at 100%. This assumption would
- 36 result in a small, but favorable to claimant, overestimation of the actual dose (BWXT Pantex 2001).
- 37 The only unplanned release of uranium occurred on January 10, 1986, when exhaust fans were
- inadvertently turned on and off several times following a test detonation at Firing Site 23. This action
- 39 resulted in the release of particulate material containing depleted uranium (BWXT Pantex 2004). All
- 40 personnel in the area were upwind (NE at that time) of the release point. The release lasted a short
- 41 time (1 to 2 minutes) (BWXT Pantex 2004). The curie activity of this release was not monitored and

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- 1 soil samples could not determine event deposition because previous uncontained test shots had
- 2 contaminated the area around the Firing Site (MHSMC 1986).

3 **4.2.1.3** Plutonium

- 4 Plutonium concentrations are very low (e.g., around 0.01-0.02 μBg/m³) and can probably be
- 5 accounted for by fallout from atmospheric testing, because plutonium arrives at Pantex as sealed pits,
- 6 which preclude oxidation or other means of dispersal (BWXT Pantex 2001). Even when aged
- 7 weapons are dismantled for inspection or refurbishment, plutonium is not available in a form for
- 8 release [17].

9 **4.2.1.4** Thorium

- 10 Thorium releases to the atmosphere have not been routinely monitored as have uranium, plutonium,
- and tritium (BWXT Pantex 2001), although monitoring for thorium has been a component of the
- 12 Pantex Plant Environmental Monitoring Program (at least in air and soil since about 1998). Although
- thorium arrives at the Plant as an uncoated and unsealed metal, it does not oxidize readily. Even
- when aged weapons are dismantled for inspection or refurbishment, little or no thorium is available in
- a form for release. Any thorium released would likely be ThO₂ and International Commission on
- 16 Radiological Protection (ICRP) clearance Type S (ICRP 1996) [18].

4.2.2 <u>Rationale for Showing that Organ Doses Due to Intakes of Environmental Levels of Radionuclides at Pantex ARE Negligible</u>

19 4.2.2.1 Negligible Individual Dose Level

- 20 The National Council on Radiation Protection and Measurements (NCRP) has defined a negligible
- 21 individual effective dose as 10 µSv (1 mrem) per year (NCRP 1993). It follows that an annual dose to
- 22 an organ or tissue that is 10 μSv (1 mrem) or less is also negligible. Furthermore, a committed dose
- of 10 µSv (1 mrem) or less to an organ or tissue from intakes during a year is also negligible. If it can
- 24 be shown that airborne concentrations of radionuclides measured in the Pantex environment are
- 25 negligible in the sense that they produce negligible doses using these criteria, then no effort need be
- 26 expended to assess them [19].

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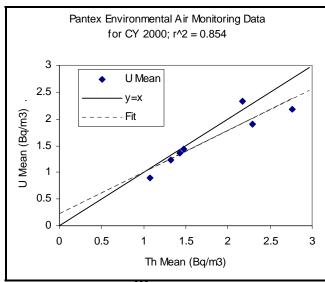
4.2.2.2 Evidence that Onsite Airborne Uranium and Thorium Levels Are Mostly of Natural Origin

Of the four principal radionuclides measured in the air at Pantex, ²³²Th and uranium occur naturally, while ³H and plutonium do not occur in significant quantities in nature (BWXT Pantex 2001). A

31 concentration from which a background or control value has been subtracted is called a net

concentration. Because nonzero concentrations of ²³²Th and uranium are observed off the site due to

- natural sources not related to Pantex operations, it is logical to subtract such "control" values from
- 34 observations at the Plant. Thorium and uranium emissions from Pantex operations are unlikely to
- 35 have temporal correlation with each other because they arise from different campaigns. The
- 36 observation that uranium air concentrations at a given sampler location are strongly correlated with
- 37 thorium air concentrations at that location supports the hypothesis that much of the uranium and
- 38 thorium is due to uranium and thorium in local dust, not to uranium and thorium released by Pantex
- operations. These correlation coefficients (r^2) are 0.854 for the 2000 means and 0.895 for the historic
- 40 means, with seven data pairs contributing to each, as shown in Figures 4-5 and 4-6, respectively.



Pantex Environmental Air Monitoring Data Historical Means; r^2 = 0.895 3 U Hist Mean 2.5 U Historical Mean (Bq/m3) y=xFit 2 1.5 1 0.5 2 0 0.5 1.5 2.5 3 Th Historical Mean (Bq/m3)

Figure 4-5. Pantex ²³⁸U and thorium mean environmental air monitoring data for 2000 at seven locations (BWXT Pantex 2001).

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Figure 4-6. Pantex ²³⁸ U and thorium mean environmental air monitoring data (historic) at seven locations (BWXT Pantex 2001).

A further argument that all or virtually all of the uranium on Pantex air samples is of natural origin is the isotope ratio of $^{233/234}$ U to 238 U. For 2000, this ratio is 1.007 \pm 0.037 (1 standard deviation), and for the historical data it is 0.981 \pm 0.086 (1 standard deviation). If the uranium were DU from the vast majority of Pantex uranium operations, the ratio would be 0.127 (DOE 2001b). The expected value of this ratio is 1.000 for natural uranium, in which ²³⁴U is in secular equilibrium with ²³⁸U and their activities are equal.

The credible upper bound concentrations to which workers could have been exposed in a year are equal to the upper 95% confidence of the mean net concentration [20]:

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$$C_{mzx,cred.} = \overline{C}_{net,95}$$
. [21]

A worker performing light work breathes 1.2 m³ of air per hour. Assuming a 2,000-hour work year, the worker takes in the radioactive material in 2.400 m³ during a year. The credible upper bound intake is 12 thus

$$I_{mzx.cred.} = 2,400 \, m^3 \times \overline{C}_{net,95}. \tag{2}$$

4.2.2.3 **Upper 95% Confidence of the Mean Net Concentration**

Environmental data for Pantex referenced in Attachment 4A, Table 4A-1, was used to calculate the values in Equation (1). The standard error of a value is related to the standard deviation by the reciprocal of the square root of the number of measurements:

$$S.E.(\overline{C}) = \frac{S.D.(\overline{C})}{\sqrt{n}}.$$
(3)

The upper 95% confidence level of the mean is the mean increased by adding the standard normal deviate for 0.95; that is, 1.645 times the standard error of the mean, so that

$$\overline{C}_{95} = \overline{C} + 1.645 \times S.E.(\overline{C}). \tag{4}$$

The upper 95% confidence level of the mean net concentration (assuming the same number of measurements was made of each) is

4
$$\overline{C}_{95,net} = (\overline{C} - \overline{C}_{background}) + 1.645 \times S.E.(\overline{C} - \overline{C}_{background}) \\
= (\overline{C} - \overline{C}_{background}) + 1.645 \times \sqrt{\{S.E.(\overline{C})\}^2 + \{S.E.(\overline{C}_{background})\}^2}.$$
(5)

- The maximum values for thorium and uranium, the two elements for which net concentrations are needed, are listed in Table 4A-1, as are the references for the maximum value for plutonium and ³H.
- 7 The observed 95% upper confidence intervals of the net means were calculated for Pantex for calendar year 2000 and for historical means. For the latter, it was necessary to estimate the standard error of the mean because the standard deviations for the historic data are not given. The standard
- deviation of the population of means was assumed to be a reasonable estimate of the standard error
- of the mean of an individual measurement. Table 4-2 lists the greatest onsite (that is, "onsite" or

12 "fenceline" but not "offsite") values [22].

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Table 4-2. Maximum values of 95% upper confidence intervals of means or net means (BWXT Pantex 2001).

Nuclide	Location	Historical mean or CY 2000	Maximum value of upper 95% confidence interval (μBq/m³)	Туре
H-3	Onsite PA-AR-06	Historical mean	819,663	Mean
Th-232	Fenceline FL-AR-10	CY 2000	2.21	Net mean
U-233/234 + U-238	Fenceline FL-AR-10	Historical mean	4.97	Net mean
Pu-239/240	Fenceline FL-AR-10	Historical mean	0.137	Mean

4.2.2.4 Dose Coefficients

The ICRP has published, and the Integrated Modules for Bioassay Analysis (IMBA) computer program calculates, "dose coefficients" in units of Sv/Bq. These coefficients are the committed equivalent dose², $H_T(\tau)$, in organ or tissue T per unit intake $h_T(\tau)$, where τ is the integration time in years following the intake. The integration time τ is 50 years for the *Reference Worker*. Dose coefficients depend on radionuclide, intake route (e.g., inhalation or ingestion), particle size (e.g., 1 or 5 μ m), transportability class (e.g., S, M, F), as well as the selection of biokinetic models. The most favorable to claimant assumptions about dose coefficients are those that result in the highest dose per unit intake.

The intake that leads to a dose D or H_T for various dose coefficients is

$$I(D) = \frac{D}{dose \ coefficient} = \frac{H_T(\tau)}{h_T(\tau)}. \tag{6}$$

26 The concentration that leads to a dose D or H_T for various dose coefficients is

¹NIOSH does not use committed equivalent dose in its dose reconstructions for probability of causation calculations. This quantity is introduced here as a simple bounding value to establish that airborne concentrations are too small to result in significant annual dose to a tissue or organ. If a committed dose value is not exceeded, an annual dose value will never be exceeded.

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$$C(D) = \frac{I(D)}{2,400m^3} = \frac{D}{(2,400m^3)(dose\ coefficient)} = \frac{H_T(\tau)}{(2,400m^3)(h_T(\tau))}.$$
 (7)

2 Substituting 10 μ Sv for H_T in the above equation gives

3
$$C(10\mu Sv) = \frac{10\mu Sv}{(2,400m^3)(h_T(\tau))}.$$
 (8)

- 4 Selecting the greatest value of $h_T(\tau)$ for each element, for example, thorium, uranium, or plutonium,
- 5 intakes results in specifying values of particle size, transportability class, and radionuclide for each
- 6 element that give "worst-case" (i.e., favorable to claimant) results; that is, the lowest concentration of
- 7 a radionuclide that results in 10 μSv committed equivalent dose to an organ or tissue following a
- 8 year's breathing of that concentration in air.
- 9 If the observed $\overline{C}_{net,95}$ is less than the concentration calculated from the previous equation,
- 10 environmental doses from that radionuclide are negligible and need not be calculated.
- If the observed $\overline{C}_{net,95}$ is greater than the concentration calculated in the previous equation, annual
- 12 equivalent doses should be examined to determine if these, when combined over the individual's
- exposure history, result in more than 10 μ Sv to the tissue in any one year.

4.2.2.5 Criteria for Determining that Maximum Credible Intakes Lead to Doses Less than 10 µSv to Most Highly Dosed Tissue or Organ

Table 4-3, Dose conversion coefficients and air concentrations leading to 10 μ Sv for 3 H, 232 Th, 234 U,

and ²³⁹Pu, lists the air concentrations that would lead to 10 µSv committed equivalent dose, as

calculated with IMBA. The table lists the tissues or organs receiving the highest $H_{\tau}(\tau)$. These values

are from ICRP Publication 71 for ²³²Th (ICRP 1996). If the 95%ile concentrations are below these

20 values, the resulting doses would be below 10 μSv (1 mrem), and there is no need to reconstruct

21 doses due to inhalation of environmental radionuclides. The resultant doses from the 95%ile

22 concentrations are below 1 mrem for all but ²³²Th Type M. A discussion on why Pantex ²³²Th is not

23 Type M follows [23].

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Table 4-3. Dose conversion coefficients and air concentrations leading to 10 μ Sv for 3 H, 232 Th, 234 U, and 239 Pu (ICRP 1995).

Nuclide	Details	Organ with highest $H_T(\tau)$	Air concentration breathed for 2,000 hours leading to 10-µSv committed equivalent dose (µBg/m3)	Dose from breathing 95%ile concentration (mrem)
Tritium	Water vapor	Small intestine	185,000,000	0.0044
Th-232	Type M, 1 μ m, $f_1 = 5E-4$	Bone surface	1.89	1.17
Th-232	Type S, 1 μ m, $f_1 = 5E-4$	Bone surface	14.4	0.15
U-234	Type S, 1 μ m, $f_1 = .002$	Lung	59.0	0.084
Pu-239/240	Type M, 1 μ m, $f_1 = 5E-4$	Bone surface	2.85	0.048

For thorium Type M (the largest upper 95% confidence level of net mean air concentration = 2.21 μ Bq/m³), indicating that a committed equivalent dose of 117 μ Sv (1.17 mrem) to bone surfaces would accumulate for each year of exposure. However, for thorium Type S, the only plausible environmental form of ²³²Th at Pantex (the largest upper 95% confidence level of net mean air concentration = 14.4

 μ Bq/m³), indicating that a committed equivalent dose of 1.5 μ Sv (0.15 mrem) to bone surfaces would accumulate for each year of exposure. For thorium intakes, committed equivalent dose to the red

3 bone marrow is always far below 10 μSv [24].

Because simultaneous exposure to the observed 95% upper confidence intervals of the means or net means of all environmental radionuclides at Pantex never leads to a committed equivalent dose to the most highly dosed tissue or organ that equals or exceeds 10 µSv, there is no need to reconstruct doses due to environmental exposures to airborne radioactive materials at Pantex.

The quantity of interest is the dose to the tissue or organ during each year, which would have contributions from intakes in each prior year. Figure 4-8 shows the annual contribution to equivalent dose to bone surfaces per unit intake for inhalation of a 1-µm AMAD Type M ²³²Th aerosol. The greatest value occurs in year 22 following intake, and the peak value is 2.41% of the average. Figure 4-9 shows the equivalent dose rate to bone surfaces for 10, 20, 30, 40, and 50 years of intakes of 1 Bq per year of the same aerosol. Figure 4-8 is derived from the results shown in Figure 4-7 by summing contributions to annual equivalent dose in a given year over the various years of intake. Figure 4-8 shows that the annual equivalent dose rate peaks at differing intervals (28, 35, 43, 49, and 50 years, respectively) after intake begins for different intake durations, and differing intervals (18, 15, 13, 9, and 0 years, respectively) after intake ends for the different intake durations.

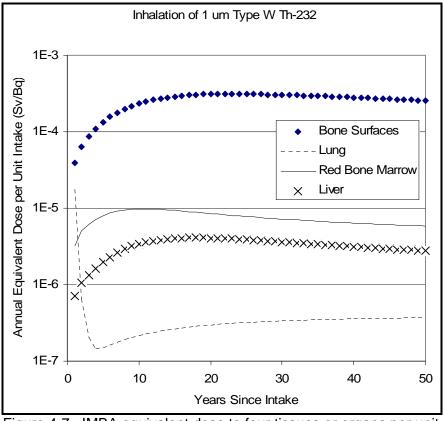


Figure 4-7. IMBA equivalent dose to four tissues or organs per unit intake (Sv/Bq) during each year for 1-µm AMAD Type W ²³²Th inhalation.

The concentration that, if breathed for the duration of a worker's employment at Pantex, would yield a peak annual equivalent dose of 10 μ Sv to bone surfaces can be deduced from the data shown in

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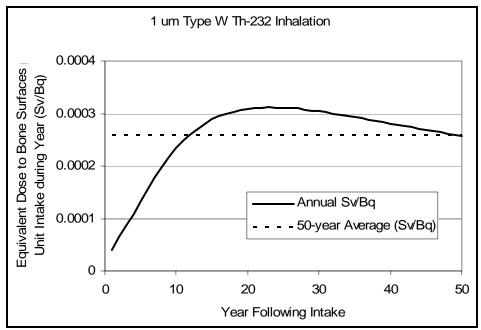


Figure 4-8. IMBA equivalent dose and average equivalent dose to bone surfaces per unit intake (Sv/Bq) during each year for 1 μ m AMAD Type W 232 Th inhalation.

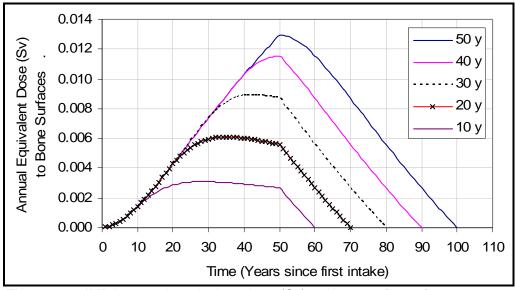


Figure 4-9. IMBA annual equivalent dose (Sv) to bone surfaces for 10, 20, 30, 40, and 50-year inhalation intakes of 1 Bq per year of 1 μ m Type W 232 Th.

Figure 4-8. They are 6.62, 3.36, 2.30, 1.78, and 1.58 μ Bq/m³, respectively, for intakes lasting 10, 20, 30, 40, or 50 years. Thus, a worker would have to breathe the 95% upper confidence level concentration at location FL-AR-10 for 33 years to reach a peak annual dose rate of 10 μ Sv in a year, and for 34 or more years to exceed 10 μ Sv in a year to bone surfaces.

As a further measure of how this calculation tends to overestimate the dose, it is implausible that thorium released from Pantex operations could be Type M, because thorium was not machined or cut, only assembled or disassembled. Thus, the only plausible means for thorium to become airborne

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- 1 would be for oxidation products to become airborne [25]. The dose factor for Type S thorium is
- 2.5 \times 10⁻⁵/4.5 \times 10⁻⁵ = 55% of the dose factor for Type M thorium. If the thorium is type S, then even a
- 3 50-year continuous exposure to the maximum credible concentration does not lead to an annual
- 4 equivalent dose to bone surfaces in excess of 10 μSv, as shown above.
- 5 For all other organs and tissues, combining maximum credible intakes to all radionuclides combined
- 6 never exceeds 10 μSv in any calendar year, even for 50 years continuous exposure.

7 4.2.3 Annual Intakes from Resuspension

- 8 Soil sampling and analysis were routinely performed at the Pantex Plant (BWXT Pantex 2001). In
- 9 addition, several special surveys were performed, but methods for soil sampling and analysis were
- 10 not standardized throughout the DOE weapons complex until the early 1970s. In 1973, DOE
- 11 dedicated a laboratory to soils analysis and purchased or fabricated the necessary field and
- 12 laboratory equipment.
- 13 As stated in Section 4.2.1, concentrations of radionuclides in soil were not used to determine
- 14 resuspension as part of the concentration of radionuclides available for inhalation. This analysis
- 15 assumed that air monitored concentrations included a real-time resuspension fraction. This
- 16 assumption is reasonable because:
- The topography of the site and the region is very flat and dry (BWXT Pantex 2001).
- The meteorology of the site and the region is very consistent and relatively invariable (Snyder 1993).
- Wind speed and direction are relatively consistent and constant, respectively (see Figure 4-10 and Table 4-5) (BWXT Pantex 2001).
- 22 For reconstructing potential missed or unmonitored dose, annual concentrations at all site locations
- are less than the maximums considered in the calculations of Section 4.2.2 [26]. These
- 24 concentrations result in negligible doses. Therefore, no dose should be assigned to missed or
- 25 unmonitored dose from resuspension of radionuclides.

26 4.3 EXTERNAL DOSE

- 27 Before 1989, radiation workers were the only employees monitored for radiation exposure. These
- personnel worked primarily in facilities in Zones 4 and 12 [27]. Radiation workers accounted for about
- 29 half of the workers on the site [28]. Therefore, employees working in other areas or zones were not
- 30 monitored. Estimated occupational environmental dose would have to be added for those employees
- 31 who were not monitored.

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- 32 Pantex workers are subjected to external doses from ambient radiation levels on the site. Ambient
- radiation levels were not reported until 1986 [29].

4.3.1 <u>Ambient Radiation</u>

- 35 The environmental radiological profile for the Pantex Plant is for dose reconstruction when personal
- 36 dosimetry or bioassay program participation was not required or was not available. ASERs were
- 37 reviewed for data that would be useful in reconstructing ambient radiation levels. Data in these
- 38 historical documents (see reference section for citations by year) included ambient TLD radiation

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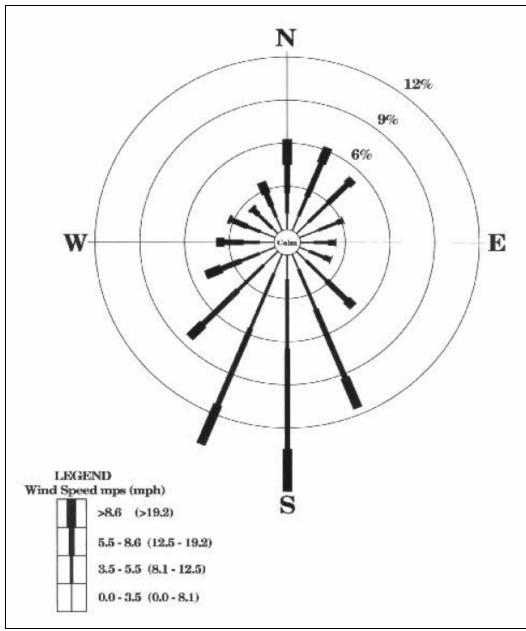


Figure 4-10. Wind rose for 2000 (BWXT Pantex 2001).

measurements. An ambient radiation level program was initiated and reported beginning in 1986. Figure 4-11 shows the locations of the monitors and TLD dosimeters in 2000 (Laseter 1987).

The dosimetry results from the ambient environmental monitoring program for the Pantex facility were analyzed to determine whether there was a difference in the dose rates on the plant site and off site.

No environmental dose rates were recorded for the years prior to 1986 [30]. Prior to this time, the environmental data consisted of radionuclide concentrations in air, water, soil, vegetation, and jackrabbits [31]. Thus, the analysis is most appropriate for the years 1986 to 2002 but extrapolations to prior years can be made.

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Table 4-5. Climatological data for 2000 by month (BWXT Pantex 2001).

		emperature °	C (°F)	Mean relative	Precipitation ^a millimeters	meters	d speed per second per hour)
Month	Maximum	Minimum	Mean monthly	humidity (%)	(inches)	Mean	Maximum
January	22.4	-11.3	3.8	46	3.05	4.8	15.3
	(72.3)	(11.7)	(38.8)		(0.12)	(10.7)	(34.0)
February	25.0	-8.5	7.7	41	0.00	5.6	15.7
	(77.0)	(16.7)	(45.9)		(0.00)	(12.5)	(34.9)
March	26.2	-4.7	8.4	63	105.66	5.8	16.8
	(79.2)	(23.5)	(47.2)		(4.16)	(12.8)	(37.4)
April	32.8	-1.7	13.9	52	7.37	6.2	15.1
	(91.0)	(28.9)	(57.0)		(0.29)	(13.8)	(33.6)
May	38.7	3.8	20.7	46	21.59	6.4	17.0
	(101.7)	(38.8)	(69.3)		(0.85)	(14.1)	(37.8)
June	34.6	11.7	25.3	75	176.02	5.9	17.5
	(94.3)	(53.1)	(70.1)		(6.39)	(13.2)	(38.9)
July	38.3	16.1	26.1	55	0.00	5.3	15.5
	(100.9)	(61.0)	(79.0)		(0.00)	(11.8)	(34.4)
August	36.6	15.9	27.5	38	0.00	5.1	12.3
	(97.9)	(60.6)	(81.5)		(0.00)	(11.3)	(27.3)
September	37.8	-0.1	22.7	38	0.00	5.5	14.1
	(100.0)	(31.8)	(72.9)		(0.00)	(12.2)	(31.3)
October	35.7	-0.1	14.7	71	134.62	5.1	14.2
	(96.3)	(31.8)	(58.5)		(5.30)	(11.3)	(32.7)
November	20.8	-8.5	3.5	71	0.00	4.9	13.4
	(69.4)	(16.7)	(38.3)		(0.00)	(10.8)	(29.7)
December	17.9	-13.6	-0.8	70	0.00	4.6	15.8
	(64.2)	(7.5)	(30.6)		(0.00)	(10.3)	(35.1)
Annual ^b			14.5	56	443.31	5.4	
			(57.4)		(17.65)	(12.1)	

Includes water equivalent of snowfall.

The dose rate data used for the analysis was from TLD readings except for the offsite dose rates for 1990. In 1990 there were apparent problems with the TLD system because, for most dosimeter locations, there was only one non-zero quarterly value (MHSMC 1991). Because the TLD data appeared to be in error, for 1990 only, the offsite dose rate data were obtained from bulb dosimeters located at the same sampling locations [32].

Figure 4-12 shows the average of the on-site and off site radiation doses. In 1986, the Chernobyl incident released sufficient radioactive materials so that a spike in environmental dose rates was observed in locations far removed from the Pantex site (e.g., Oklahoma City and Austin, Texas) (TDH 1999). The dose rates shown in Figure 4-12 for 1986 may have been elevated solely due to the Chernobyl incident.

Linear regression, as depicted in Figure 4-12, was performed on the dose rates reported from 1986 through 2000 and the trend lines for offsite and onsite doses were found to converge. According to the trend lines, convergence occurs between 1998 and 2000, depending on which data set is used. According to the trend lines, as time goes backward to 1950, the difference in onsite and offsite dose rates increases. Of course, this trend cannot go on forever in the past but this analysis can well serve the purpose of estimating, favorable to claimant wise, ambient missed dose on the Pantex Plant Site. The difference in the slopes of the trend lines were used to estimate onsite ambient environmental doses back to 1950. See Table 4-6.

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Annual mean of parameter (when indicated) except for precipitation. Total precipitation is indicated. Annual maximum and/or minimum temperatures and/or annual maximum wind speed may be obtained by reviewing the data in the appropriate column.

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Based on the data in Table 4-6 and to be favorable to claimants, it is suggested that unmonitored or missed onsite ambient occupational dose for the years from 1951 through 1974 be added to a persons dose record at the rate of 100 mrem/year, and the unmonitored or missed onsite ambient occupational dose for the years from 1975 through 2000 be added to a persons dose record at the rate of 50 mrem/year. This would result in a maximum unmonitored or missed ambient dose of about 3750 mrem for the 50-year period [33].

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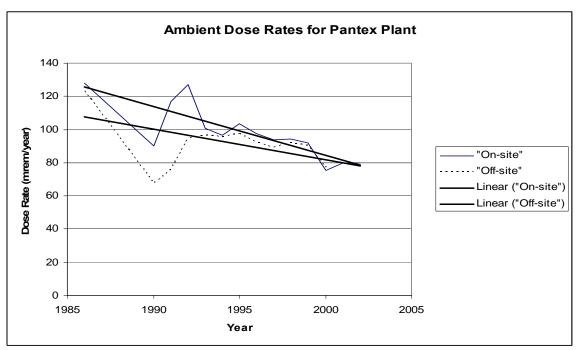


Figure 4-12. Ambient dose rates for Pantex Plant.

Table 4-6. Calculated difference between onsite and offsite annual doses for the Pantex plant [34].

Year	Difference between on-site and offsite radiation dose rates (mrem/year)
1950	110
1955	98
1960	87
1965	76
1970	65
1975	53
1980	42
1985	31
1990	20
1995	8
2000	2

The Pantex historical personnel external dose monitoring program was reviewed and determined to have been properly managed in regard to storage of control badges and accounting for environmental exposures [35]. It is concluded that doses of record properly include occupational environmental doses and no adjustments of recorded doses need be made for monitored workers [36].

4.4 UNCERTAINTY

- As discussed in the previous sections, estimates of annual intakes were based on air monitoring data and their sampling and analytical uncertainties. Where needed, the analysis made conservative (i.e.,
- 12 favorable to claimant) assumptions. The estimated annual concentrations based on monitoring data
- precluded the use of calculated meteorological conditions that could introduce large, additional
- 14 uncertainties.

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- 1 In instances where more detailed information is known about a particular individual or job
- 2 classification, dose reconstruction should account for other modifying factors. For example, if (for a
- 3 particular job classification) there is reason to believe that the actual ventilation rate for the worker
- 4 might vary markedly from the average of 2,400 m³/yr of exposure, the dose reconstructor should use
- 5 professional judgment to adjust the estimated intakes as necessary, according to whether the
- 6 individual was engaged in light or heavy work. The respiration rate is 1.2 m³/hr for light work and
- 7 1.7 m³/hr for heavy work (Shleien 1992). In these cases, to estimate annual intake, sum the products
- 8 of the fractional annual period for each job-dependent level of work and the corresponding ventilation
- 9 rate to determine the total ventilation volume for the year in cubic meters. The annual intake is the
- product of the annual ventilation volume and the annual average concentration for the location of
- 11 interest.

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- 12 Based on TLD measurements of ambient external dose, the annual mean external gross dose (not
- net dose) on the site was 0.910 mSv with a standard deviation of 0.140 mSv. However, additional
- 14 bias and uncertainty has been identified in TLD dosimeters. Biases and uncertainties for typical TLD
- 15 systems have been identified as described by Fix and Stewart (ORAUT 2006b).
- 16 The factors to be applied to various dosimeters are:
- Based on the distribution of energy levels and geometry judged most likely, recorded dose divided by the table's bias value to calculate deep dose.
 - Range of overall bias factors based on alternative distributions of energy levels and geometry.
- Systematic uncertainty resulting from lack of knowledge of actual distributions of energy levels and geometry.
- Random uncertainty resulting from variation among workers in energy levels and geometry.
- 23 Overall, these biases and uncertainties in external personnel dosimeters could lead to an additional
- 24 factor-of-2 increase in the recorded dose.
- 25 For this document, no attempt has been made to quantify other uncertainties.

4.5 ATTRIBUTIONS AND ANNOTATIONS

- 27 Where appropriate in the preceding text, bracketed callouts have been inserted to indicate
- 28 information, conclusions, and recommendations to assist in the process of worker dose
- 29 reconstruction. These callouts are listed in this section with information that identifies the source and
- 30 justification for each item. Conventional references are provided in the next section that link data,
- 31 quotations, and other information to documents available for review on the Oak Ridge Associated
- 32 Universities (ORAU) Team servers.
- 33 Dillard B. Shipler served as the initial Document Owner of this document. Mr. Shipler was previously
- 34 employed at the Pantex site and his work involved management, direction or implementation of
- radiation protection and/or health physics program policies, procedures or practices related to atomic
- 36 weapons activities at the site. This revision has been overseen by a new Document Owner, who is
- fully responsible for the content of this document, including all findings and conclusions.

1 2 3	[1]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Detailed source terms for the Pantex Plant are classified and were not made available.
4 5 6 7 8	[2]	Winslow, Robert C. ORAU Team. Senior Health Physicist. April 2007. DU contains about 99.8% ²³⁸ U, 0.2% ²³⁵ U, and 0.001% ²³⁴ U by mass. Application of the specific activities of 1.24E-8 TBq/g for ²³⁸ U, 8.00E-8 TBq/g for ²³⁵ U, and 2.31E-4TBq/g for ²³⁴ U results in 1.24E-6 TBq for ²³⁸ U, 1.60E-8 TBq for ²³⁵ U, and 2.31E-7TBq for ²³⁴ U and a total activity of 1.49E-6 TBq.
9 10 11	[3]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Pantex internal dosimetry manuals do not even address ²³³ U.
12 13 14 15 16	[4]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Since few devices were disassembled prior to 1980, releasable uranium oxide was available only in old devices, and releases of tritium occurred only during disassembly. Airborne radioactive materials were not deemed a potential concern until 1980.
17 18 19 20 21	[5]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Uranium oxide released when old devices were disassembled was known and dispersion was controlled within the cells. Only small amounts of tritium were released when the container was disconnected from its assembly.
22 23 24	[6]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Tritium reservoirs came as sealed containers and the seal was not broken during insertion.
25 26 27 28	[7]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. From review of documents and interviews of personnel (see Martin 2004, ORAUT 2006a), metal came as formed items, so no activities were performed that would generate oxides.
29 30 31 32 33	[8]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. From review of documentation and interview of personnel (see Martin 2004, ORAUT 2006a), no materials containing metals were burned during this period, so no oxides were formed or released.
34 35 36 37 38 39	[9]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Once tritium reservoirs were in place (inserted), valves were opened. When the device was disassembled, the valve was closed and the reservoir was removed. A small amount of tritium was released from between the reservoir and the device. These amounts are summarized in Table 4-1.

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1 2 3 4	[10]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Specific releases of radioactive materials from Pantex facilities are classified and not available. Summaries are provided in annual reports except for a few historical incidents.
5 6 7 8	[11]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. This is based on review of plant documents, interviews with plant personnel, and personal and professional judgment.
9 10 11 12 13 14 15	[12]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Considering time-related production, time-related availability of radioactive materials on the site, and the small concentrations of radioactive materials in the air and soil when releases of radioactive materials could have occurred after 1980, initial analyses of potential intakes and resulting doses led the authors to believe that potential doses from intakes would be negligible.
16 17 18 19 20 21	[13]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. The team reviewed a number of "General Radiation Survey Forms for Bays/Cells" related to surveys of gland nut removals when disassembling tritium reservoirs. Most were "0" μ Ci, many were 10 μ Ci, and only a few were more than 10 μ Ci. The statement is a general statement of the reviews.
22 23 24 25	[14]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. The factor was derived based on review of many years of Pantex documentation, professional judgment, and favorability to claimants.
26 27 28 29	[15]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. The factor was derived based on review of Pantex documentation, professional judgment, and favorability to claimants.
30 31 32 33	[16]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. August 2006. Uranium oxide released when old devices were disassembled was known and dispersion was controlled in the cells.
34 35 36 37	[17]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. Plutonium pits removed during disassembly are still sealed and, therefore, no releases of plutonium occur.
38 39 40	[18]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. This is the form of thorium that was monitored when monitoring did occur for thorium.

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1 2 3	[19]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. "Negligible doses" will not contribute to doses deemed necessary to produce cancers.
4 5 6 7 8 9	[20]	Winslow, Robert C. ORAU Team. Senior Health Physicist. March 2007. A distribution of the environmental air samples taken outside the facility would represent the entire facility. While working at a facility, workers, in general, will move around, thus receiving exposures to different concentrations. However, a worker might spend a longer period in higher concentrations; the distribution would be diluted by the lower concentration areas. Therefore, the 95% confidence of the mean is assumed to be bounding to account for a worker spending the majority of the time in the higher concentration.
11 12 13 14	[21]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. This equation is a mathematical expression of the statement preceding the equation and referenced above.
15 16 17 18 19 20 21	[22]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The Pantex Plant monitored concentrations of radionuclides in air at the site boundary and at select offsite locations (outside the site boundary). However, concentrations of radionuclides were not monitored regularly at locations within the site boundary. Areas within the site boundary (outside facilities) were monitored on an as-needed basis depending on the activities.
22 23 24 25	[23]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The argument is presented in case the form of ²³² Th can be shown to be type M. The possibility is remote but the subject is covered.
26 27 28 29	[24]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The argument is presented to clarify the situation that involves bone surface cancer versus red bone marrow cancer where ²³² Th might be thought to be a contributor.
30 31 32 33	[25]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The statement means that pure thorium metal particulates could not be released to the air. Only particulates of thorium oxide could be released.
34 35 36 37 38	[26]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The paragraph seems self-evident. The authors compared the maximum concentrations at various locations, which were all less than the concentrations used to demonstrate negligible doses in Section 4.2.2.
39 40 41 42	[27]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The history of radiation monitoring of external dose to workers is covered in ORAUT-TKBS-0013-6, Rev. 00 (ORAUT 2006c), particularly in Table 6-15 and Figure 6-1.

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	Dood	Treviolet No. 61 No. 61 Page 61 61
1 2 3 4	[28]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The history of radiation monitoring of external dose to workers is covered in ORAUT-TKBS-0013-6, Rev. 00 (ORAUT 2006c), particularly in Table 6-15 and Figure 6-1.
5 6 7 8 9	[29]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. After reviewing annual environmental reports and their predecessor documents and talking with Plant personnel, it is evident that radioactive materials were sampled in environmental media but direct radiation was not monitored at all locations.
10 11 12 13 14	[30]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. After reviewing annual environmental reports and their predecessor documents and talking with Plant personnel, it is evident that radioactive materials were sampled in environmental media but direct radiation was not monitored at all locations.
15 16 17 18 19	[31]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. After reviewing annual environmental reports and their predecessor documents and talking with Plant personnel, it is evident that radioactive materials were sampled in environmental media but direct radiation was not monitored at all locations.
20 21 22 23 24	[32]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. According to Pantex personnel and early site environmental and external monitoring data, bulb dosimeters were used before other dosimeters but were kept in the system as backup as new dosimetry was implemented.
25 26 27 28 29	[33]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The evaluation was based on the data in the spreadsheet and professional judgment in defining the factor and rounding it to a number that is favorable to the claimant and easy for the dose reconstructor to use.
30 31 32 33	[34]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The calculations were performed in a spreadsheet and the results of interest were included in the table and the figure to demonstrate the point.
34 35 36 37 38 39	[35]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. All Pantex external dosimetry program documents, including Pantex (2002), were reviewed along with implementation reports and databases, and long-time employees were interviewed, as indicated in the several memoranda to file. The evidence seemed to justify the statements of credibility and reliance on the result of the programs as they grew and matured.
40 41 42 43	[36]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. All Pantex external dosimetry program documents, including Pantex (2002), were reviewed along with implementation reports and databases, and long-time employees were interviewed,

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1 2		as indicated in the several memoranda to file. The evidence seemed to justify the statements of credibility and reliance on the result of the programs as they grew and matured.
3 4 5 6	[37]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. Section 4.2.2.5 discusses the potential for a small cumulative dose to bone surface because of dose factors and solubility factor selection.
7 8 9 10 11	[38]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. Because the lines converge noticeably to modern times and because the doses are relatively small, judgment concludes that single conservative values that are favorable to the claimant would be adequate rather than the imposition of a function for year-by-year doses.
12 13 14 15 16	[39]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. From the graph, the lines might be interpreted to converge in 2002. However, for conservatism and favorability to claimants, the convergence is not considered an end point and the proposed doses should be applied to current years.
17 18 19 20 21 22	[40]	Shipler, Dillard B. Pacific Northwest National Laboratory. Principal Health Physicist. September 2006. The storage of control badges in places where environmental doses as well as work-related doses do not exist means that differences between badges worn by workers and control badges account for all exposures. Note in the paragraph above that unmonitored workers must have dose added to their total.

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	Alexander, R. E., 1975, Environmental Monitoring Report for Pantex Plant Covering 1974, MHSMP-75-8, Mason & Hanger-Silas Mason Company, Pantex Plant, Amarillo, Texas, May 1. [SRDB Ref ID: 13087]			
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1 2 3	BP (Battelle Pantex), 1992, <i>Technical Basis for the Internal Dosimetry Program and the DOE Pantex Facility</i> , Rev. 1. BWXT Pantex, Pantex Plant, Amarillo, Texas, February 14. [SRDB Ref ID: 13312]
4 5 6	BP (Battelle Pantex) and MHC (Mason Hanger Corporation), 1998, 1997 Environmental Report for Pantex Plant, DOE/AL/65030-9804, Pantex Plant, Amarillo, Texas, June. [SRDB Ref ID: 13710]
7 8 9	BP (Battelle Pantex) and MHSMC (Mason & Hanger-Silas Mason Company), 1994, 1993 Environmental Report for Pantex Plant, DOE/AL/65030-9413, Amarillo, Texas, June. [SRDB Ref ID: 13708]
10 11 12	BP (Battelle Pantex) and MHSMC (Mason & Hanger-Silas Mason Company), 1992, <i>Pantex Plant Site Environmental Report for Calendar Year 1991</i> , Pantex Plant, Amarillo, Texas, December. [SRDB Ref ID: 13706]
13 14 15	BP (Battelle Pantex) and MHSMC (Mason & Hanger-Silas Mason Company), 1995, 1994 Environmental Report for Pantex Plant, DOE/AL/65030-9506, Amarillo, Texas, June. [SRDB Ref ID: 13709]
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18 19	BWXT Pantex, 2002, 2001 Site Environmental Report for Pantex Plant, DOE/AL/66620-2002, Pantex Plant, Amarillo, Texas, December. [SRDB Ref ID: 13082]
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<u>Isotope</u>	<u>Activity</u>	
	fraction	
²³⁴ U	0.0840	
²³⁵ U	0.0145	
²³⁸ U	0.9015	

32 detection limit (lower)

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Minimum quantifiable exposure or neutron flux that can be detected.

37 film dosimeter

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Small packet of film within a holder that attaches to a wearer.

Unit or "particle" of electromagnetic radiation consisting of X- and/or gamma rays.

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photon

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 photon - x-ray Electromagnetic radiation of energies between 10 keV and 100 keV whose source can be an X-ray machine or radioisotope. 			
quality factor, Q Modifying factor used to derive dose equivalent from absorbed dose.			
radiation Alpha, beta, neutron, and photon radiation.			
radioactivity Spontaneous emission of radiation, generally alpha or beta particles, gamma rays, and neutrons from unstable nuclei.			
rem Unit of dose equivalent, which is equal to the product of the number of rad absorbed and the "quality factor."			
oentgen (R) Unit of exposure to gamma (or X-ray) radiation. It is defined precisely as the quantity of gamma (or X-) rays that will produce a total charge of 2.58 x 10 ⁻⁴ coulomb in 1 kg of dry air. An exposure of 1 R is approximately equivalent to an absorbed dose of 1 rad in soft tissue for higher (>100 keV) energy photons.			
shallow absorbed dose (D _s) Absorbed dose at a depth of 0.007 cm in a material of specified geometry and composition.			
shallow dose equivalent (H_s) Dose equivalent at a depth of 0.007 cm in tissue.			
shielding Material or obstruction that absorbs (or attenuates) radiation and thus tends to protect personnel or materials from radiation.			
skin dose Absorbed dose at a tissue depth of 7 mg/cm ² .			
thermoluminescent Property of a material that causes it to emit light as a result of being excited by heat.			
thermoluminescent dosimeter (TLD) Holder containing solid chips of material that when heated will release the stored energy as light. The measurement of this light provides a measurement of absorbed dose.			
whole-body dose Absorbed dose at a tissue depth of 1.0 cm (1,000 mg/cm²); also used to refer to the recorded dose.			
X-ray Ionizing electromagnetic radiation that originates external to the nucleus of an atom.			

ATTACHMENT 4A RADIONUCLIDE INTAKE AND OCCUPATIONAL EXPOSURE

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TABL	<u>TITLE</u> PA	\GE
4A-1 4A-2	References for maximum air concentrations for tritium (oxidized), thorium, uranium, and plutonium used in Section 4.2.2 dose analyses	
4A.1	RADIONUCLIDE INTAKE	
occup assigr to the	on the information in Section 4.2.2 of this Technical Basis Document, all potential doses from ational environmental intakes on the Pantex Plant are considered negligible and should be need zero dose. Some attention might be paid to claims based on bone surface cancers relating the worker spent at the Pantex Plant [37]. As stated in Section 4.2.2, the committed do 32 Th conservatively might be 117 μ Sv (1.17 mrem).	ve
4A.2	EXTERNAL EXPOSURE	
analys differe lines o unmoi worke	ent external doses on the Pantex site have been monitored by TLDs since 1986. Based on training of onsite and offsite TLD measurements, as described in Section 4.3.1, the extrapolated ince in offsite and onsite doses in 1951 could be as much as 100 mrem/year [38]. The trend converge in about 2000 [39]. So it is recommended that 100 mrem/year be added to initiored workers for the years 1951 through 1975 and 50 mrem/year be added to unmonitored in the years 1975 through 2000. This would result in a maximum unmonitored or missed int dose of about 3750 mrem for the 50 year period.	k
have lexpos	antex historical personnel external dose monitoring program was reviewed and determined to been properly managed in regard to storage of control badges and accounting for environmentures (Pantex 2002). It is concluded that doses of record properly include occupational nmental doses and no adjustments of recorded doses need be made for monitored workers	

The following tables provide supporting data for the analyses described in the TBD:

ATTACHMENT 4A RADIONUCLIDE INTAKE AND OCCUPATIONAL EXPOSURE Page 2 of 2

Table 4A-1. References for maximum air concentrations for tritium (oxidized), thorium, uranium, and plutonium used in Section 4.2.2 dose analyses (BWXT Pantex 2001).

Radionuclides	Tables in DOE (2001a)
Tritium (oxidized)	Table 5.1, page 5-8, location PA-AR-06
Thorium-232	Table 5.3, page 5-11, location FL-AR-05
Uranium-234/234 & 238	Table 5.4, page 5-12, location FL-AR-05
	Table 5.5, page 5-14, location FL-AR-05
Plutonium 239/240	Table 5.7, page 5-18, location FL-AR-08

Table 4A-2. Upwind "control" (location OA-AR-13) average annual air concentrations.

Isotopes/elements	Number of samples	Concentration (μBq m ⁻³) (mean ±standard deviation)	Previous 3 y mean
Tritium oxide	-	-	-
Uranium	12	2.32 ± 1.08	1.26
Plutonium	-	-	-
Thorium	12	2 17 ± 1 37	1 85